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16	UNITED STATES	DISTRICT COURT
17	NORTHERN DISTRI	CT OF CALIFORNIA
18	SAN FRANCI	SCO DIVISION
19	· /	Master File No. 3:15-cv-03747-JD
20	INFORMATION PRIVACY LITIGATION	) )       PLAINTIFFS' REVISED PROPOSED CASE
21		MANAGEMENT SCHEDULE IN CONNECTION WITH THE JUNE 29, 2016
22	This Document Relates To:	CASE MANAGEMENT CONFERENCE
	ALL ACTIONS.	DATE: June 29, 2016
23		) TIME: 1:30 p.m. CTRM: 11, 19th Floor
24		JUDGE: Hon. James Donato
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Plaintiffs hereby submit Plaintiffs' Revised Proposed Case Management Schedule in Connection with the June 29, 2016 Case Management Conference. Plaintiffs' revised proposed schedule removes unnecessary event deadlines and corrects inadvertent date selections including those which landed on a weekend or Court Holiday.

Event	Plaintiffs' Revised Proposal
Begin Merits and Class Discovery	Immediately
Defendant's Answer	June 2, 2016
Supplemental Initial Disclosures	June 15, 2016
Substantial Completion of Document Production	September 15, 2016
Fact Discovery Cut-Off	Current agreement is November 1, 2016
Class Certification Motion	November 16, 2016
Depositions of Plaintiffs' Experts Retained for Class Certification Issues (if necessary)	December 1, 2016 – December 15, 2016
Class Certification Opposition	December 19, 2016
Depositions of Defendant's Experts Retained for Class Certification Issues (if necessary)	January 3, 2017 – January 18, 2017
Class Certification Reply	January 20, 2017
Rule 26 Disclosures of Experts Retained by Either Party for Trial	January 23, 2017
Last Day to File Dispositive Motions	January 23, 2017
Hearing on Dispositive Motions	April 5, 2017 or TBD

1	Event	Plaintiffs' Revised Proposal
2	Final Pre-Trial Conference	TBD
3	Trial-Ready Date	May 9, 2017
4		
	DATED: June 28, 2016	ROBBINS GELLER RUDMAN
6		& DOWD LLP SHAWN A. WILLIAMS
7		DAVID W. HALL
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# **CERTIFICATE OF SERVICE**

I hereby certify that on June 28, 2016, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 28, 2016.

> s/ Shawn A. Williams SHAWN A. WILLIAMS

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# Mailing Information for a Case 3:15-cv-03747-JD. Document 128 Filed 06/28/16 Page 6 of 7 Page 6 of 7 Page 8 of 7 P

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### **Manual Notice List**

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